

**U. S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON, DIVISION**

**United States District Court
Southern District of Texas
FILED**

JAN 26 2010

Clerk of Court

**UNITED STATES OF AMERICA
(PLAINTIFF)**

V.

**\$56,657.00 IN U.S. CURRENCY
(RESPONDENT)**

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CIVIL ACTION NO. 4:09-cv-04101

DEFENDANT'S VERIFIED ORIGINAL ANSWER

TO THE HONORABLE COURT OF SAID COURT:

Defendant, Valentine Osigboh files this Original Verified Answer to Plaintiff's Original Petition.

A. SPECIFIC DENIAL

2. Defendant Admits Paragraphs 1, 3, 4, 5, 6, 7, 8 and 9.
3. Defendant denies Paragraph 2 only to the extent that it failed to disclose that Defendant completed a Report of International Transport of Currency or Monetary Instruments (FinCEN Form 105) once an officer reminded him.
4. The money made the subject of this lawsuit was earned by defendant legally.

D. PRAYER

5 For these reasons, Respondents ask the court to enter judgment against Plaintiff, and restore the money made the subject of this litigation to defendant and assess costs against Plaintiff, and award respondents attorney fees and all other relief to which they are entitled.

Respectfully Submitted,

(w)



PRINCE UCHE NWAKANMA
FED ID# 36183
7322 S.W.FREEWAY, SUITE 1900
HOUSTON, TEXAS 77036
TEL:(713) 271-0711
FAX: (713) 271-0725
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served on all counsels of records in the manner required by the rules on the 25th day of January 2010.

Albert Ratliff
Assistant U. S. Attorney
P. O. Box 61129
Houston, Texas 77208


TONY IWUORIE

IN THE STATE OF TEXAS

§

§

IN THE COUNTY OF HARRIS

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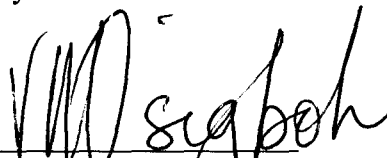
AFFIDAVIT OF VALENTINE OSIGBOH

BEFORE ME, the undersigned authority, on this day personally appeared Mr. Valentine Osigboh, who by me duly sworn, on oath stated:

My name is Valentine Osigboh. I am above eighteen years of age and fully competent to swear this affidavit based on the personal knowledge of facts sworn herein.

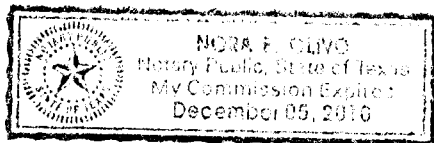
1. I am the Defendant in the above-style and numbered cause.
2. On or about November 26, 2009, I was travelling to Nigeria on KLM Airline Flight #662.
3. Unfortunately, I forgot to complete a Report of International Transport of Currency or Monetary Instruments (FinCEN Form 105) because I was running late to catch my flight, until I was reminded by an officer.
4. Thereafter, I declared that I was carrying about Fifty six thousand seven hundred (\$56,700.00), and immediately completed FinCEN Form 105. In fact, the exact amount I was carrying was fifty six thousand six fifty six hundred fifty seven (\$56,657.00).
5. The Officer seized the fund
6. The money I was carrying was obtained lawfully.

Further Affiant Sayeth Not



VALENTINE OSIGBOH

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority,
on the 22nd day of January, 2010.





**NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS**

December 05, 2010
My commission expires on: